

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

ALBERTO RAMOS,

Plaintiff,

v.

SCOTT ERWIN, ET AL.

Case No. 4:23-cv-2517

Defendants.

MOTION TO WITHDRAW DEPARTED COLLEAGUE AS COUNSEL

Brittany Francis (“Counsel”) requests approval to withdraw her departed friend and colleague, Kiah Duggins, as counsel of record for Mr. Alberto Ramos and states:

1. Counsel represents Mr. Ramos, as did her colleague Kiah Duggins.
2. Kiah Duggins was on the plane that crashed coming into D.C. on January 29, 2025, and she has passed away.
3. Kiah Duggins was a courageous leader, extraordinary advocate, and loving spirit, and she has made the world better and brighter for her time in it.
4. Counsel seeks to withdraw Kiah Duggins as counsel of record for Mr. Ramos, with assurance to the Court that Counsel will ensure Mr. Ramos is represented with the zeal and excellence he deserves and in honor of Kiah Duggins’ legacy.

WHEREFORE, Counsel requests that the Court enter an order authorizing the withdrawal of Kiah Duggins as counsel of record for Mr. Ramos and for such further relief as the Court deems appropriate.

Dated: February 24, 2025

s/ Brittany Francis

Brittany Francis (pro hac vice)
brittany@civilrightscorps.org

Civil Rights Corps
1601 Connecticut Ave. NW, Suite 800
Washington, D.C. 20009
Telephone: (202) 844-4975

Caitlin Halpern (Texas Bar; 24116474;
S.D. Tex. Bar No. 3454643)*
* Attorney-in-Charge.

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

ALBERTO RAMOS,

Plaintiff,

v.

SCOTT ERWIN, ET AL.

Case No. 4:23-cv-2517

Defendants.

**PROPOSED ORDER GRANTING MOTION TO WITHDRAW DEPARTED
COLLEAGUE AS COUNSEL**

Plaintiff's Motion to Withdraw Departed Colleague as Counsel is hereby **GRANTED**.

Kiah Duggins is withdrawn as counsel of record for Alberto Ramos in this matter.

SO ORDERED.

HON. KEITH P. ELLISON
UNITED STATES DISTRICT JUDGE